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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SHEREE LAMB,

Plaintiff,

vs.

NAVIENT SOLUTIONS, LLC, EQUIFAX
INFORMATION SERVICES, LLC,
EXPERIAN INFORMATION SOLUTIONS,
INC., and TRANS UNION LLC,

Defendants.

Case No. 2:18-cv-1966-JCM-NJK

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME TO FILE
RESPONSE TO COMPLAINT**

[FIRST REQUEST]

COME NOW Plaintiff Sheree Lamb ("Plaintiff") and Defendant Navient Solutions, LLC ("NSL"), by counsel and pursuant to Local Rule 6-1, and stipulate as follows:

STIPULATION

1. On October 11, 2018, Plaintiff filed a Complaint with this Court [ECF No. 1].
2. NSL was served with the Complaint on October 12, 2018.
3. NSL's response to the Complaint is due by November 2, 2018.
4. In order to adequately investigate the allegations and explore the possibility of an early resolution, NSL desires an extension until December 3, 2018, to file a response to the Complaint.
5. Counsel for NSL conferred with counsel for Plaintiff regarding this Stipulation. Counsel for Plaintiff agrees to the requested extension.

1 6. This Stipulation is filed in good faith and not for dilatory or other improper purpose.
2 Plaintiff would not suffer any prejudice by the Court permitting NSL the requested extension of time
3 and has consented to the requested extension.

4 7. This is the first request for extension of time for NSL to respond to the Complaint.

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6 DATED: November 2, 2018.

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8 /s/ Matthew W. Park
Matthew W. Park
9 Nevada Bar No. 12062
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10 1707 Village Center Circle, Suite 150
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11 *Counsel for Defendant*
12 *Navient Solutions, LLC*

/s/ Kevin L. Hernandez
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Counsel for Plaintiff
Sheree Lamb

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15 **ORDER**

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17 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

20 DATED: November 2, 2018
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